IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF ALABAMA

ROBERT D. BELUE, et al.,)
)
Plaintiffs,) CIVIL ACTION CASE NO
) 2:06-cv-1034-WKW
VS.)
)
A.O. SMITH ELECTRICAL PRODUCTS)
COMPANY, a division of A.O.)
Smith Corporation, et al.,)
)
Defendants.)
)

RULE 7.1 DISCLOSURE STATEMENT OF DEFENDANT GOULD ELECTRONICS INC.

COMES NOW Defendant, GOULD ELECTRONICS, INC. (named in Plaintiffs' Complaint as Nikko Materials USA, Inc. d/b/a Gould Electronics, Inc.), by and through its attorneys of record, and pursuant to Federal Rule of Civil Procedure 7.1, hereby submits this, its Disclosure Statement, and shows the Court as follows:

1. Whether the named Defendant has a parent company, and if so, what company.

Yes. Nippon Mining & Metals Co., Ltd.

2. Whether the named Defendant has publicly traded stock.

No.

- 3. Whether a publicly traded entity owns 10% or more of the named Defendant's company stock and if so, what entity.
 - No, however, Nippon Mining & Metals Co., Ltd. is a wholly owned subsidiary of Nippon Mining Holdings, Inc., a publicly traded company.

This 21st day of December, 2006.

/s/Gregory M. Taube Gregory M. Taube Alabama Bar No. ASB-4499-A41G

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CERTIFICATE OF SERVICE

This is to certify that I have this day served a true and correct copy of the foregoing RULE 7.1 DISLCOSURE STATEMENT OF DEFENDANT GOULD ELECTRONICS INC. via electronic filing, to all counsel of record, including the following:

Counsel for Plaintiffs:

G. Patterson Keahey, Esq. One Independence Plaza Suite 612 Birmingham, AL 35209

This 21st day of December, 2006.

/s/ Gregory M. Taube Gregory M. Taube Alabama Bar No. ASB-4499-A41G

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